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November 8, 2019

HR2W

Attn: Carolina Balazs
Office of Environmental Health Hazard Assessment
1515 Clay Street, 16th Floor
Oakland, CA 94612
Submitted via email: HR2W@OEHHA.CA.GOV

Subject: Achieving the Human Right to Water: OEHHA's Draft Assessment of the State's Community Water Systems

On behalf of Valencia Heights Mutual Water Company (VHWC), we would like to thank you for the opportunity to submit the following comments about the Office of Environmental Health Hazards Assessment (OEHHA), Assessment of the State's Community Water Systems. Founded in 1912, VHWC is a not-for-profit, community-owned mutual water company, located in the San Gabriel Valley of Los Angeles County, serving an ethnically diverse community.

VHWC aligns its comments with those submitted by the California Association of Mutual Water Companies (CalMutuals) and the Community Water Systems Alliance (CWSA). We also share the concerns raised by academic experts engaged by OEHHA to review the draft Assessment Tool, who found that the purpose, use and intended actions stemming from using the Assessment Tool are ambiguous. Overall, we urge OEHHA to withdraw the report and work with the water community and other state agencies to develop more consistent indicators for accessibility and affordability; and align the Assessment Tool with other assessments being formulated by the Department of Water Resources (DWR) and the State Water Resources Control Board under processes that were legislatively mandated.

We would like to highlight the following concerns and recommendations:

1. A metric is needed to measure the role and effectiveness of state agencies charged with regulating water, issuing grants, and emergency response. One such metric may be a score card for the grant-making process with the goal of issuing grants and denials in six (6) months or less.
2. We urge OEHHA to refrain from overstating and misleading the public about the quality of the state's drinking water, given the skewed "50% glass half-full" orientation of the Draft Assessment Tool.

3. We urge OEHHA to work with water economists and water purveyors to determine additional metrics relevant to the Affordability Component so that this important issue can be better addressed in the Assessment Tool.

We appreciate this opportunity for submitting comments and hope that they are accepted in our common endeavor of fulfilling the State's Mandate for the Human Right to Water.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "D. Michalko", with a long horizontal flourish extending to the right.

David Michalko
General Manager